

# EXHIBIT A

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JOSEPH MANTHA, on behalf of himself  
and all others similarly situated,

Plaintiff,

v.

QUOTEWIZARD.COM, LLC,

Defendant.

Civil Action No. 1:19-cv-12235-LTS

**DEFENDANT'S FOURTH SET OF INTERROGATORIES TO PLAINTIFF**

Defendant QuoteWizard.com, LLC ("QuoteWizard") hereby propounds, pursuant to Fed. R. Civ. P. 33, its Fourth Set of Interrogatories to Plaintiff Joseph Mantha ("Mantha").

**INTRODUCTION AND DEFINITIONS**

1. Each interrogatory seeks all information available to the Plaintiff or to Plaintiff's agents, and to any other person acting on Plaintiff's behalf. Each of the interrogatories shall be deemed to be continuing in the manner provided by law. If an interrogatory cannot be answered in full, answer to the fullest extent possible and specify all reasons for the inability to answer in full.

2. If Plaintiff claims any privilege or immunity from discovery with regard to any information sought herein, then please provide a summary of all facts and circumstances upon which the claim of privilege or immunity is based.

3. These interrogatories are continuing in nature. Should Plaintiff acquire additional information responsive to these requests after serving his responses hereto, the responses shall be supplemented so as to provide such additional information.

4. As used herein, the term “person” is defined as any natural person or business, legal, or governmental entity or association.

5. As used herein, the term “concerning” means referring to, describing, evidencing, or constituting.

6. As used herein, a request to “identify” a natural person shall be deemed a request for that person's name, current address and telephone number, and the name, address and telephone number of that person’s current employer or business, if known.

7. As used herein, a request to “please state the basis” or “state all facts” shall be deemed a request to provide a substantial summary of the factual basis supporting the claim, allegation, or defense at the time the interrogatory is answered. The summary shall: (a) identify the essential acts or failures to act, forming the substance of the claim, allegations, or defense; (b) identify the persons and entities that, through firsthand information or possession of documents, are the sources of the party’s information regarding the claim, allegation, or defense; (c) when one or more documents is the basis of the claim, allegation, or defense, such as a written contract in a contractual claim or defense, or a written misrepresentation in a misrepresentation claim, identify or provide as part of the interrogatory answer a copy of each such document.

8. If used herein, “Plaintiff” or “Mantha” shall refer to Plaintiff Joseph Mantha, or any individuals or entities acting on your behalf.

9. If used herein, “QuoteWizard” shall refer to QuoteWizard.com, LLC or any individual or entity acting on its behalf.

10. Where used herein, “call” or “called” means the making of any contact by telephone, including but not limited to telephone calls (whether missed, answered, or resulting in a voicemail message), and text messages.

**INTERROGATORIES**

36. Identify and provide a list of names of employees, independent contractors, and/or agents of Dr. Franklin Perkins School who had access to your cell phone number or called your cell phone number in 2019, or whom you called from your cell phone number in 2019, including in your answer their names, positions of employment relative to Dr. Franklin Perkins School, and any number from which they may have called or did call your cell phone number in 2019, or the number(s) you called in 2019, including their business and personal numbers.

37. Identify the telephone numbers used for the “on call” system at Dr. Franklin Perkins School in 2019.

QuoteWizard.com, LLC,

By its attorneys,

*/s/ Christine M. Kingston*

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Dated: September 10, 2020

**CERTIFICATE OF SERVICE**

I, the undersigned, of the law offices of Nelson Mullins Riley and Scarborough LLP, attorneys for Defendant QuoteWizard.com LLC, do hereby certify that I have served all parties of record with copies of the below listed documents by e-mail and U.S. Mail on this 10<sup>th</sup> day of September 2020:

Documents:

- Defendant QuoteWizard.com, LLC's Fourth Set of Interrogatories to Plaintiff Joseph Mantha

*/s/ Christine M. Kingston*

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Christine M. Kingston